

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Andrenita Haddad	:	Chapter 13
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Debtors	:	Case No.: 20-12890-MDC

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**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

The Debtor, Andrenita Haddad (the “Debtor”), by and through their undersigned counsel, hereby move to modify their Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about July 03, 2020 (the “Petition Date”).
2. The Chapter 13 Plan was confirmed by this Honorable Court on or about December 08, 2020.
3. During a period of months between July 2022, and December 2022, the undersigned counsel incurred additional legal fees during the course of assisting the Debtor with numerous notices and certifications of default pertaining to the Debtor’s residence and vehicle.
4. The undersigned counsel undertook numerous tasks in furtherance of the Debtor’s chapter 13 case, including communicating with counsel for the Debtor’s mortgage company and car lender and keeping the Debtor informed during all times relevant.
5. The undersigned counsel is concurrently filing a Supplemental Application for Compensation which provides a detailed list of tasks completed for the

benefit of the Debtor. See Exhibit “A,” a true and correct copy of the Supplemental Fee Application which is being filed concurrently with this Motion to Modify Plan.

6. Accordingly, the Debtor is filing the instant Motion to Modify Plan to provide for the fees requested in the Supplemental Fee Application.

7. Debtor has paid \$10,394.00 to the Chapter 13 Trustee to date.

8. The Modified Chapter 13 Plan will provide for plan payments in the amount of \$261.00 per month for 16 months for a new base amount of \$14,570.00.

WHEREFORE, Debtor, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan.

Dated: March 8, 2023

/s/Brad J. Sadek, Esq

Brad J. Sadek, Esq.

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